

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**UNITED STATES OF AMERICA,**

Case No. 3:15-CR-358

Plaintiff,

JUDGE ZOUHARY

**-vs-**

**SUPPLEMENTAL MEMORANDUM IN  
SUPPORT OF MOTION FOR  
RELEASE FROM CUSTODY**

**IBRAHIM MOHAMMAD ,**

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Attorney for Defendant Ibrahim Mohammad

Defendant.

Now comes Defendant Ibrahim Mohammad, through counsel, who submits the following corrective supplement to his Motion for Release from custody and supporting memorandum (Doc. 46):

In his Motion and Memorandum, counsel for Mr. Mohammad was inaccurate regarding a particular set of dates. The second full paragraph on page 5 of the Motion and Memorandum should read as follows:

Because Mr. Mohammad lived in Texas when he was arrested, the initial probation department assessment recommended detention because of a lack of contact with the district

where the charge was filed. Obviously, this is incorrect. Mr. Mohammad has significant community contact. The family lived here for 10 years, just having left for Texas six months ago. Mr. Mohammad worked here, his kids went to school here, the family was active in religious, school, and civic organizations. They have family in the area and many, many friends. Since relocating to the Toledo area in December of 2015, Mr. Mohammad's wife and children are re-engaged in all of those activities that tie them once again to this community.

Counsel for Mr. Mohammad would not want the release or detention decision to hinge on his temporal inexactitude.

Respectfully Submitted,

/s/ David Klucas  
David Klucas  
Attorney for Defendant Ibrahim Mohammad

**Certification**

This shall certify that a copy of the forgoing was sent to all counsels of record via the Court's ECF Notification System on this 18<sup>th</sup> day of February 2015.

/s/ David Klucas  
David Klucas